

BAUTE CROCHETIERE HARTLEY & McCOY LLP
777 South Figueroa Street, Suite 3800
Los Angeles, CA 90017
Tel (213) 630-5000 • Fax (213) 683-1225

PRHLAW LLC
PAUL R. HEJMANOWSKI (#94)
paul@prhlawllc.com
CHARLES H. McCREA (#104)
charles@prhlawllc.com
520 South Fourth Street, Suite 360
Las Vegas, Nevada 89101
Telephone: (702) 834-6166

BAUTE CROCHETIERE HARTLEY & McCOY LLP
MICHAEL J. HARTLEY (*Pro Hac Vice* to follow)
mhartley@bautelaw.com
COURTNEY A. PALKO (*Pro Hac Vice* to follow)
cpalko@bautelaw.com
777 South Figueroa Street, Suite 3800
Los Angeles, California 90017
Telephone: (213) 630-5000
Facsimile: (213) 683-1225

Attorneys for Defendant
Illinois National Insurance Company

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

COMMISSIONER OF INSURANCE FOR THE
STATE OF NEVADA AS RECEIVER OF
LEWIS & CLARK LTC RISK RETENTION
GROUP, INC.,

Plaintiff,

v.

IRONSHORE SPECIALTY INSURANCE
COMPANY; INDIAN HARBOR INSURANCE
COMPANY f/k/a CATLIN INSURANCE
COMPANY, INC.; ILLINOIS NATIONAL
INSURANCE COMPANY; RSUI
INDEMNITY COMPANY; ENDURANCE
AMERICAN SPECIALTY INSURANCE
COMPANY; US RE CONSULTING AGENCY
SERVICES, INC., a Nevada corporation; UNI-
TER UNDERWRITING MANAGEMENT
CORP.; UNI-TER CLAIMS SERVICES
CORP.; U.S. RE CORPORATION; LEWIS &
CLARK LTC RISK RETENTION GROUP
INC., a Nevada corporation; TAL PICCIONE,
an individual; DOES 1 through 100, and each of
them, inclusive; ROE COMPANIES 1 through
100, and each of them, inclusive,

Defendants.

Case No. 2:25-cv-00789-ART-EJY
Hon. Anne R. Traum

Notice of Removal Filed: May 6, 2025

JOINT STIPULATION AND ~~[PROPOSED]~~
ORDER TO EXTEND DEFENDANT
ILLINOIS NATIONAL INSURANCE
COMPANY'S TIME TO RESPOND TO
COMPLAINT BY 30 DAYS

(FIRST REQUEST)

1 Plaintiff Commissioner of Insurance for the State of Nevada (“Plaintiff”) and Defendant
2 Illinois National Insurance Company (“Illinois National”) (collectively the “Parties”) hereby
3 stipulate, by and through their respective counsel of record, and subject to the Court’s approval, as
4 follows:

5
6 1. Plaintiff filed the Complaint in Nevada state court on December 30, 2024 (ECF #1-1)
7 and Illinois National was served with the Complaint on April 21, 2025.

8 2. A notice of removal was filed in this action on May 6, 2025 (ECF #1).

9 3. Illinois National’s deadline to respond to the Complaint is May 13, 2025. Fed. R. Civ.
10 Proc. 81(c)(2)(C) (seven days after notice of removal is filed).

11 4. Illinois National requires additional time to prepare its response to the Complaint.

12 5. The Parties therefore agree, subject to the Court’s approval, to extend the deadline for
13 Illinois National to answer, move to dismiss, or otherwise respond to the Complaint by thirty (30)
14 days, to June 12, 2025.

15 6. The Parties agree that good cause exists for this extension.

16 7. This is Illinois National’s first requested extension.

17 8. By entering into this stipulation Plaintiff does not waive, or intend to waive, any rights
18 in this matter, including, without limitation, any and all rights related to Plaintiff’s ability to seek
19 remand of this matter to Eighth Judicial District Court (“State Court”) in Nevada, pursuant to 28
20 U.S.C. section 1447, or any other right or remedy, which Plaintiff expressly reserves.

BAUTE CROCHETIERE HARTLEY & MCCOY LLP
777 South Figueroa Street, Suite 3800
Los Angeles, CA 90017
Tel (213) 630-5000 • Fax (213) 683-1225

1 **THE PARTIES HEREBY STIPULATE AND AGREE**, subject to the Court's approval,
2 that Illinois National's deadline to answer, move to dismiss, or otherwise respond to the Complaint
3 is extended to June 12, 2025.

4
5 DATED: May 12, 2025

WIRTHLIN & VERLAINE

6
7 By: /s/ Brenoch Wirthlin

Brenoch R. Wirthlin

Attorneys for Plaintiff Commissioner of Insurance for the
State of Nevada

8 DATED: May 12, 2025

PRHLAW LLC

BAUTE CROCHETIERE HARTLEY & McCOY LLP

9
10 By: /s/ Charles McCrea

Charles McCrea

Attorneys for Defendant Illinois National Insurance
Company

11
12
13
14 **IT IS SO ORDERED:**

15 
16 UNITED STATES MAGISTRATE JUDGE

17 DATED: May 12, 2025

BAUTE CROCHETIERE HARTLEY & McCOY LLP
777 South Figueroa Street, Suite 3800
Los Angeles, CA 90017
Tel (213) 630-5000 • Fax (213) 683-1225